

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

DECLARATION OF DAVID SACKLER

Under 28 U.S.C. § 1746, I, DAVID SACKLER, declare under the penalty of perjury that the following is true and correct:

1. I am a member of the Raymond Sackler family. Raymond Sackler was my grandfather. In this declaration, when I refer to my family, I am referring to the Raymond Sackler family, which is also referred to as Side B.

2. I am submitting this declaration in support of the Debtors' proposed Plan, including the Shareholder Settlement.¹ My family and I support the Shareholder Settlement because it represents an extraordinary opportunity to bring much needed resources to abate the opioid crisis, rather than spending years and depleting those resources defending the lawsuits against us. But neither I nor my family would agree to support the Plan or pay the Settlement Amount unless all civil claims against us for Purdue's Opioid-Related Activities are fully, finally and permanently released.

3. I am deeply saddened by the opioid crisis and the fact that OxyContin, a product Purdue made to help people, played a part in it. OxyContin was intended to help—and I believe has helped and continues to help—provide relief to millions of Americans suffering from pain

¹ Undefined capitalized terms are as defined in the Plan under consideration by the Court.

severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate.

4. I look forward to the time that the billions of dollars that my family and the Mortimer Sackler family have offered in the proposed Shareholder Settlement can be put to work to abate the opioid crisis. We are prepared to relinquish our interest in Purdue, dispose of our overseas pharmaceutical companies and fund the Shareholder Settlement to bring help to those who need it. We would prefer that the money be spent on efforts to abate the opioid crisis rather than being spent on years of litigation. But my family and I are only willing to support and fund this Shareholder Settlement as part of a resolution in which we receive the broad releases contemplated by the proposed Plan. We are not willing to endorse any resolution that leaves our family exposed to new lawsuits relating to historical Purdue conduct. The releases contemplated by the Plan are essential to achieve that objective, and my family would never agree to make the payments provided for in the Plan without receiving the releases.

5. The alternative to the Shareholder Settlement is litigation. I believe that we have good legal defenses to the claims asserted against my family. If the Shareholder Settlement and releases are not approved, my family and I will vigorously defend ourselves.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed on August 4, 2021.



David Sackler